

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

v.

OMER KUZU

NO. 3:19-CR-327-M

MOTION FOR DETENTION

The United States moves for detention of defendant, **Omer Kuzu**, pursuant to 18 U.S.C. §3142.

1. Eligibility of Case. This case is eligible for a detention order because the case involves (check all that apply):

- ☐ Crime of violence (18 U.S.C. §3156);
- ☐ Maximum sentence life imprisonment or death
- ☐ 10 + year drug offense
- ☐ Felony, with two prior convictions in above categories
- ☒ Serious risk defendant will flee
- ☐ Serious risk obstruction of justice
- ☐ Felony involving a minor victim
- ☐ Felony involving a firearm, destructive device, or any other dangerous weapon
- ☐ Felony involving a failure to register (18 U.S.C. § 2250)
- ☐ Petition for Supervised Release Revocation was filed

2. Reason for Detention. The Court should detain defendant because there are no conditions of release which will reasonably assure (check one or both):

☒ Defendant's appearance as required

☒ Safety of any other person and the community

3. Rebuttable Presumption. The United States will/will not invoke the rebuttable presumption against defendant because (check one or both):

☐ Probable cause to believe defendant committed 10+ year drug offense or firearms offense, 18 U.S.C. §924(c)

☒ Probable cause to believe defendant committed a federal crime of terrorism, 18 U.S.C. §2332b(g)(5)

☐ Probable cause to believe defendant committed an offense involving a minor, 18 U.S.C. §§1201, 2251

☐ Previous conviction for "eligible" offense committed while on pretrial bond

☐ Probable cause to believe Defendant violated terms of supervised release, FRCP 32.1(a)(6).

4. Time For Detention Hearing. The United States requests the Court conduct the detention hearing,

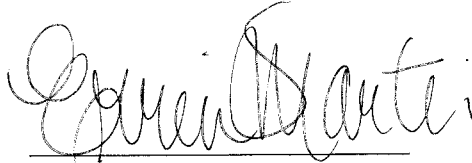
☒ At first appearance

☐ After continuance of _____ days (not more than 3).

DATED this 1st day of August, 2019.

Respectfully submitted,

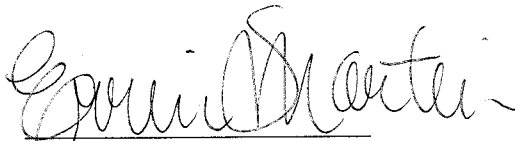
ERIN NEALY COX
UNITED STATES ATTORNEY

A handwritten signature in cursive script, appearing to read "Errin Martin", written over a horizontal line.

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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was served on counsel for the
defendant in accordance with the Federal Rules of Criminal Procedure on this 1st day
of August, 2019.

A handwritten signature in cursive script, appearing to read "Errin Martin", written over a horizontal line.

ERRIN MARTIN
Assistant United States Attorney